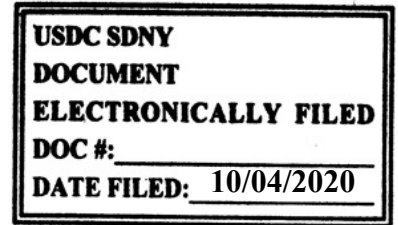


Jeffrey A. Rothman
Attorney at Law
305 Broadway, Suite 100
New York, NY 10007
Tel.: (212) 227-2980; Cell: (516) 455-6873
Fax: (212) 591-6343
rothman.jeffrey@gmail.com



MEMO ENDORSED

October 2, 2020

By ECF To:

Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The telephonic Status Conference scheduled for Wednesday, October 7, 2020 at 12:00 p.m. is hereby rescheduled to Wednesday, November 4, 2020 at 11:15 a.m. Counsel for the parties are directed to call Judge Parker's court conference line at the scheduled time. Please dial (866) 434-5269, Access code: 4858267.

SO ORDERED:

Katharine H. Parker

HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

10/04/2020

Re: Darlene Oliver v. City of New York, et al., 19 Civ. 2321 (MKV) (KHP)

Your Honor:

I am counsel for Plaintiff in the above-captioned action. I write, with opposing counsel's consent, to respectfully request that the Court adjourn the telephonic conference presently scheduled for October 7, 2020 at Noon. The undersigned will be starting a trial before Judge McMahon on October 6, 2020. Additionally, the parties presently have no issues to discuss with the Court.

Fact discovery is set to close in this case on February 4, 2021. Plaintiff is still waiting for Defendants to respond concerning Plaintiff's request that they remedy certain deficiencies in the Defendants' discovery responses to date, and follow-up with providing certain further information that Defendants had promised to continue to search for and / or to provide. Defendants have been hampered in seeking and / or obtaining certain information due to the COVID pandemic, but will endeavor to work cooperatively with Plaintiff's counsel in the near future to address Plaintiff's concerns (hopefully without the need for, or by limiting, the need for judicial intervention concerning discovery) and to move the case toward the commencement of depositions (either live or remotely via Zoom as conditions permit) shortly.

I thank the Court for its consideration in this matter.

Respectfully submitted,

/S/

Jeffrey A. Rothman